

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

IN THE MATTER OF THE SEARCH OF

Case No. 4:20-MJ-00070-SAO

USPS Priority Mail Express Parcel
EE206730048US addressed to "Symeriah
Scott 505 Stewart St Apt F4 Fairbanks AK
99701" located at the 341 W Tudor Rd.
Ste. 208, Anchorage, AK 99503

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41
FOR A WARRANT TO SEARCH AND SEIZE**

I, Postal Inspector Alexander Laumb, being first duly sworn, hereby
depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. In this warrant application, I seek authority to search USPS Priority Mail Express Parcel EE206730048US addressed to "Symeriah Scott 505 Stewart St Apt F4 Fairbanks AK 99701" from "Holder Fowler 2200 W Olympic BLVD Los Angeles CA 90006" (hereinafter referred to as "**the Subject Parcel**") for controlled substances in violation of Title 21 U.S.C. Sections 841(a)(1) and 843(b), and Title 18, United States Code, Section 1716.
2. I am a U.S. Postal Inspector employed by the Seattle Division of the U.S. Postal Inspection Service, specifically in the Anchorage Domicile. I am a sworn federal law enforcement officer empowered to investigate criminal activity involving or relating to the United States Postal Service and/or United States Mail. As part of my duties, I investigate incidents where

the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances in violation of Title 21, United States Code, Sections 841(a) (1) Possession with Intent to Distribute a Controlled Substance, and Title 21, United States Code, Section 843(b), Use of a Communication Facility to Facilitate the Commission of a Federal Drug Felony, and Title 18, United States Code, Section 1716, Injurious articles as nonmailable.

3. I am a U.S. Postal Inspector and have been so employed since August of 2019. I attended and graduated from a three-month Basic Inspector Training (BIT) academy operated by the United States Postal Inspection Service (USPIS) in November 2019. While attending the BIT academy, I received training and instruction on investigating federal crimes that use the U.S. Mail including but not limited to the sending of illegal drugs through the U.S. Mail, robbery and burglary of postal facilities, destruction of government property, theft of U.S. Mail, possession of stolen U.S. Mail, mail and bank fraud, identity theft, and counterfeit personal checks and identifications.
4. Prior to my employment with the USPIS, I was employed for nine years by the Washington National Guard Counterdrug Program as a Criminal Analyst. From 2010 to 2015, I was assigned to the Tri-City Metro Drug Task Force in Kennewick, WA and the Snohomish Regional Drug Task Force in Everett, WA. In 2016 I deployed in support of Special Operations

Joint Interagency Task Force – Operation Inherent Resolve (SOJTF-OIR). Upon my return I was assigned to the Western Regional Counterdrug Training Center as the Threat Finance Senior Instructor and Branch Chief for Law Enforcement Support instruction from 2017 to 2019.

5. In May 2009 I received a bachelor's degree in Political Science from Pacific Lutheran University in Tacoma, WA. The following information is based on my own knowledge, information obtained from other law enforcement agents and officers, and from specific sources as set forth herein. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

BACKGROUND INFORMATION ABOUT SUBJECT PARCELS

6. Based on my experience, training and discussions with other law enforcement officers experienced in drug investigations, I know that certain indicators exist when persons use the United States Mails to ship controlled substances from one location to another. Indicators for parcels that contain controlled substances include, but are not limited to the following:
 - i. These parcels in many instances contain a fictitious return address, incomplete return address, no return address, the return address is same as the addressee address, or the return address does not match the place where the parcel was mailed from. These packages

are also sometimes addressed to or from a commercial mail receiving agency (i.e., UPS Store). These address practices are used by narcotics traffickers to hide the true identity of the person(s) shipping and/or receiving the controlled substances from law enforcement officials.

- ii. Shippers of controlled substances will often utilize cash as payment instead of credit or debit cards. These payment practices are used by narcotics traffickers to hide their true identity and make it difficult for Law Enforcement to identify them.
- iii. I know from training and discussions with other law enforcement officers that the following controlled substances are likely to be found during parcel interdictions: marijuana, methamphetamine, cocaine, LSD, psilocybin mushrooms, heroin, opium, and MDMA.

FEDERAL STATUTES

7. Based on my investigation in this case, I submit that there is probable cause to search USPS Priority Mail Express parcel EE206730048US for evidence, fruits, and instrumentalities of violations of the following federal statutes:

- i. Title 21, United States Code, Section 841 generally prohibits the “knowing or intentional manufacture, distribution, dispensing, or possession with intent to manufacture, distribute, or dispense, a controlled substance[.]”

- ii. Title 21, United States Code, Section 843(b) criminalizes the knowing or intentional use of any communication facility in committing or in causing to facilitate the commission of any act or acts constituting a felony under any provision of this subchapter or subchapter II of this chapter.
- iii. Title 18, United States Code, Section 1716 prohibits the mailing of nonmailable matter, including, but not limited to, poison, and “all other natural or artificial articles, compositions, or materials which may kill or injure another, or injure the mails or other property, whether or not sealed as first class matter[.]”

STATEMENT OF PROBABLE CAUSE

8. On September 22, 2020, while researching Postal databases, Inspector Kevin Horne identified **The Subject Parcel** as suspicious due to the following factors:

- A. **The Subject Parcel** was mailed from California, a known drug source area for narcotics being shipped to Alaska.
- B. **The Subject Parcel** was mailed via Priority Mail Express, a service utilized by individuals involved in drug trafficking because the product arrives within 2-3 days and offers tracking services.
- C. A review of postal databases revealed that the postage for **the Subject Parcel** was paid for with cash in Los Angeles, CA.

9. On September 22, 2020, I made arrangements for **the Subject Parcel** to be held at the USPS Processing and Distribution Center in Anchorage, AK for further review.
10. On September 23, 2020, I retrieved the Subject Parcel and confirmed that **the Subject Parcel** addressed to "Symeriah Scott 505 Stewart St Apt F4 Fairbanks AK 99701" from "Holder Fowler 2200 W Olympic BLVD Los Angeles CA 90006" **The Subject Parcel** is a USPS small shipping carton measuring 12 inches x 10 inches x 8 inches, affixed with a Priority Mail Express postage label in the amount of \$71.35 that weighs approximately four (4) pounds five (5) ounces, and was shipped from Las Angeles, CA 90075, on September 21, 2020. A photograph of **the Subject Parcel** is included as **Exhibit 1**.
11. Upon researching the label information, I found **the Subject Parcel** to contain indicators consistent with packages known to contain contraband.

I. A Google search was conducted on the return address of **the Subject Parcel**, "Holder Fowler 2200 W Olympic Blvd Los Angeles CA 90006." The search identified the return address as belonging to the "Tuscan Garden Inn." Based on my training and experience and experience with other law enforcement officers, I know people who utilize the U.S. Mail to traffic narcotics often use addresses associated to hotels or motels in an effort to remain anonymous to law enforcement.

II. A search of "CLEAR" for "Symeriah Scott" did not associate the name to the recipient address "505 Stewart St Apt F4 Fairbanks AK 99701." The data provided by "CLEAR" is a combination of over 33 billion records from over 8,800 different data sources which are updated daily, weekly, monthly, and annually, depending on the particular data source.

III. A search of "CLEAR" for "Holder Fowler" did not associate the name to the return address of "2200 W Olympic Blvd Los Angeles CA 90006."

12. On September 23, 2020, I made arrangements for Airport Police K-9 Officer Handler Scott and her canine "Skye" to examine **the Suspect Parcel** at the Postal Inspection Service Office in Anchorage, AK.
13. On September 23, 2020, at approximately 10:23 AM, K-9 Officer Scott and her canine "Skye" searched an area at the Postal Inspection Service Office for **the Subject Parcel**. At approximately 10:27 AM Officer Scott, "Skye's" handler, advised me that the canine located the **Subject Parcel** and exhibited a change in behavior consistent with the presence of an odor of a controlled substance the canine is trained to recognize. Attached hereto as **Exhibit 2** and incorporated herein by reference is a true and correct copy of a written statement provided by Officer K-9 Scott which sets forth "Skye's" training and experience as a narcotics detector dog.

14. **The Subject Parcel** is currently in my custody at the U.S. Postal

Inspection Service office located at 341 W Tudor Rd. Ste. 208, Anchorage,

AK 99503, and is in its original sealed and intact condition.

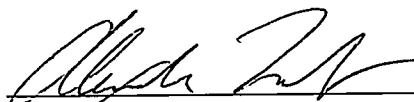
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CONCLUSION

15. Based on my training and experience as a Postal Inspector and the
aforementioned factors, I believe there is probable cause to believe that
the Subject Parcel, USPS Priority Mail EE206730048US contains
controlled substances and/or other evidence of violations of Title 21,
United States Code, Sections 841(a)(1) and 843(b), and Title 18, United
States Code, Section 1716.



Alexander Laumb
Postal Inspector, USPIS
Anchorage Domicile

~~Subscribed and sworn to before me~~
this 23rd day of September, 2020



United States Magistrate Judge
District of Alaska
~~Anchorage~~, Alaska
Fairbanks

